

EXHIBIT “E”

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

EVELYN CINTRON	:	
Plaintiff,	:	
	:	
v.	:	
	:	Civil Action No. 19-4078-RBS
CITY OF PHILADELPHIA, et al.	:	
Defendants.	:	
	:	
	:	
	:	

**DEFENDANT CITY OF PHILADELPHIA’S ANSWERS AND OBJECTIONS TO
PLAINTIFF’S INTERROGATORIES**

Defendant, the City of Philadelphia, by and through undersigned counsel, and pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, responds and objects to Plaintiff’s, Evelyn Cintron (“Plaintiff” or "Ms. Cintron") Interrogatories as follows:

PRELIMINARY STATEMENT

1. Defendant's investigation and development of all facts and circumstances relating to this action is ongoing. These responses and objections are made without prejudice to, and are not a waiver of, Defendant's right to rely on other facts or documents at trial.

2. By making the accompanying responses and objections to Plaintiff’s interrogatory, Defendant does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such responses into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, Defendant makes the responses and objections herein without in any way implying that it considers the requests and interrogatory, and responses to the requests and interrogatory, to be relevant or material to the subject matter of this action.

Answer: N/A.

4. While plaintiff was commanding officer of the PAL unit, did the defendant ever receive from PAL complaint(s) about plaintiff's work performance?

Answer: Upon information and belief, no specific complaints were received about Plaintiff's work performance, however PAL employees had general complaints about her attitude and treatment of others.

5. If the answer to the preceding interrogatory is in the affirmative, please state the date(s) and circumstances of the unsatisfactory performance.

Answer: The City of Philadelphia is not in possession of these complaints outside of anything discussed during the Internal Affairs Investigation.

6. While the plaintiff was commanding officer of the PAL unit was, she ever subjected to any form of disciplinary action?

Answer: Plaintiff retired before she could be officially disciplined.

7. If the answer to the preceding interrogatory is in the affirmative, please state the date(s) and circumstances of the disciplinary action.

Answer: Plaintiff was charged with Conduct Unbecoming 1-§011-10 and Failure to Supervise 8-§003-10 on September 18, 2018.

8. Please state if Deputy Commissioner Myron Patterson informed the defendant, City, of plaintiff's complaint(s) of the disparities in funding between PAL centers that serviced minority youth and those that serviced predominately white youth.

Answer: Upon information and belief, there were no disparities in funding and no complaints were made. By way of further answer, the City of Philadelphia does not provide funding to the PAL.

PAL centers that serviced minority children and the PAL centers that serviced predominately white children.

Answer: No.

14. State whether plaintiff's claims of discrimination in the PAL unit were ever investigated prior to her retirement in 2019.

Answer: Upon information and belief, Plaintiff did not submit claims of discrimination in the PAL unit to the Philadelphia Police Department.

15. If the answer to the preceding interrogatory is in the affirmative, please state the name and title of the person who conducted the investigation the date it was completed and the findings of the investigation.

Answer: N/A.

16. Did the defendant, City, have any of its agents, workers and or officials sitting on the PAL board of directors between January 2016 and January 2019?

Answer: Upon information and belief, the Police Commissioner holds a seat on the PAL Board of Directors

17. If the answer to the preceding interrogatory is in the affirmative, please state the names and titles of each person and the dates that they served on the PAL board of directors.

Answer: Police Commissioner, Richard Ross, Jr.

18. Between January,2016 and May,2019 did the defendant, City have a contract or any agreement with PAL detailing their relationship?

Answer: There was no formal written agreement.

19. State the number of Philadelphia police officers that were assigned to the PAL unit between January 2016 and May 2019.

**Answer: 2016- 27 P/Os
2017- 31 P/Os
2018 - 31 P/Os
2019 - 30 P/Os**

20. How do Philadelphia police officers get assigned to the PAL unit?

Answer: Interested Officers interview with transfer review and the Commanding Officer of PAL. They are asked questions related to experience on the job, outside experience with programs, volunteering, coaching, mentoring and other relevant questions pertaining to working with children. The Commanding Officer then generally makes a list of candidates they would prefer but ultimately the decision comes from a higher rank.

21. State the duties of the Philadelphia police officers that are assigned to the PAL unit.

Answer: See list of responsibilities included in the responses to Plaintiff's Request for Production of Documents.

22. State whether PAL centers are located in Philadelphia police district buildings.

Answer: No.

23. State whether PAL uses its association with the Philadelphia Police Department to promote its services to the public.

Answer: Answering Defendant is without sufficient knowledge to answer this interrogatory on behalf of the PAL.

24. State when plaintiff or her medical providers informed the City of Philadelphia that she was experiencing stress as a result of being subjected to a hostile work environment regarding her assignment at PAL.